

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - : SEALED INDICTMENT
:
20 Cr. 445-UA.
:
STEWART BARNWELL, :
a/k/a "Tutu," :
MIGUEL SANCHEZ, :
a/k/a "Miguel Roque," :
CALEB HOOKER, :
a/k/a "Khaleaf," and :
ABIMELEC JIMENEZ, :
a/k/a "Mel," :
X
Defendants.
- - - - -

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From in or about January 2020 up to and including in or about September 2020, in the Southern District of New York and elsewhere, STEWART BARNWELL, a/k/a "Tutu," MIGUEL SANCHEZ, a/k/a "Miguel Roque," CALEB HOOKER, a/k/a "Khaleaf," and ABIMELEC JIMENEZ, a/k/a "Mel," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that STEWART BARNWELL, a/k/a "Tutu," MIGUEL SANCHEZ, a/k/a "Miguel Roque," CALEB HOOKER, a/k/a "Khaleaf," and ABIMELEC JIMENEZ, a/k/a

"Mel," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a) (1).

3. The controlled substances that STEWART BARNWELL, a/k/a "Tutu," MIGUEL SANCHEZ, a/k/a "Miguel Roque," CALEB HOOKER, a/k/a "Khaleaf," and ABIMELEC JIMENEZ, a/k/a "Mel," the defendants, conspired to distribute and possess with the intent to distribute were (1) one kilogram or more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b) (1) (A); and (2) 280 grams or more of mixtures and substances containing a detectable amount cocaine base, in violation of Title 21, United States Code, Section 841(b) (1) (A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offenses alleged in Count One of this Indictment, STEWART BARNWELL, a/k/a "Tutu," MIGUEL SANCHEZ, a/k/a "Miguel Roque," CALEB HOOKER, a/k/a "Khaleaf," and ABIMELEC JIMENEZ, a/k/a "Mel," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in

any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

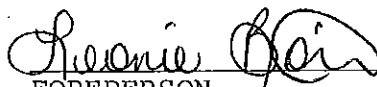
Substitute Assets Provision

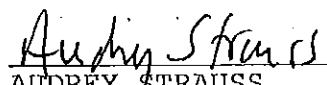
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


AUDREY STRAUSS
Acting United States Attorney

UNITED STATES DISTRICT COURT
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MIGUEL SANCHEZ, a/k/a "Miguel Roque,"
CALEB HOOKER, a/k/a "Khaleaf," and
ABIMELEC JIMENEZ, a/k/a "Mel,"

Defendants.

INDICTMENT

20 Cr.

(21 U.S.C. § 846)

AUDREY STRAUSS
Acting United States Attorney


Foreperson
